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October 16, 2014

Hon. Edgardo Ramos
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: United States v. Glenn Thomas
Ind. No. 12 Cr 626 (ER)

Dear Judge Ramos:

As anticipated at our last status conference on September 23, 2014 when I was substituted for prior counsel, this letter is respectfully submitted to formally request an extension of time for the filing of post-verdict motions from October 22, 2014 to December 22, 2014. I am in the process of reviewing the trial transcript and other materials prior to legal research for the preparation of the motion. This project is time-consuming, and also in competition with demands for my time from other CJA matters as a sole practitioner. The government consents. No prior request has been made. Thank you for your consideration of this matter.

Respectfully yours,


Michael H. Sporn

MHS/ss
Cc: Kan M. Nawaday, Esq. (By ECF)